

1 Stacy L. Fode, Esq. (SBN 199883)  
2 fode@brownlawgroup.com  
3 Tara M. Jacobson, Esq. (SBN 265622)  
Jacobson@brownlawgroup.com  
4 BROWN LAW GROUP  
600 B Street, Suite 1650  
5 San Diego, CA 92101  
(619) 330-1700 Telephone  
(619) 330-1701 Facsimile  
6 *Attorneys for THE PRUDENTIAL INSURANCE*  
COMPANY OF AMERICA

7  
8 UNITED STATES DISTRICT COURT  
9  
NORTHERN DISTRICT OF CALIFORNIA

10  
11 THE PRUDENTIAL LIFE ) Case No.: 13-cv-0817-JST(MEJ)  
12 INSURANCE COMPANY OF )  
13 AMERICA, )  
14 Plaintiff, )  
15 v. )  
16 DELLA Y. BROOKS, T.J.L., a minor )  
and TINA LANCASTER )  
17 Defendants. )  
18 )  
19 )  
20 )  
21 )

22 Tara M. Jacobson, Esq., counsel for The Prudential Insurance Company of  
23 America ("Prudential") hereby requests permission to appear telephonically at the  
24 Settlement Conference scheduled on October 16, 2013 at 10:00 a.m. Good cause  
25 exists for this request particularly in light of the fact that all parties have given oral  
26 consent to stipulate to an interpleader and dismissal of Prudential. Additionally,  
27 the minor is now represented by Ciarán O'Sullivan, Esq., appointed by the Court  
28 on June 3, 2013.

Second, counsel for Prudential lives and works in San Diego, California and counsel would be required to travel a great distance to attend the Settlement Conference.

For these reasons, Prudential respectfully requests that its counsel be permitted to appear telephonically as needed.

~~Respectfully Submitted,~~

Dated: October 7, 2013

Tara M. Jacobson, Esq. (265622)  
600 B Street, Suite 1650  
San Diego, CA 92101  
Telephone: (619) 330-1700  
Facsimile: (619) 330-1701  
*Attorney for The Prudential  
Insurance Company of America*

1 Stacy L. Fode, Esq. (SBN 199883)  
2 fode@brownlawgroup.com  
3 Tara M. Jacobson, Esq. (SBN 265622)  
4 jacobson@brownlawgroup.com  
5 BROWN LAW GROUP  
6 600 B Street, Suite 1650  
7 San Diego, CA 92101  
8 Telephone: (619) 330-1700  
9 Facsimile: (619) 330-1701  
10 Attorneys for THE PRUDENTIAL INSURANCE  
11 COMPANY OF AMERICA

12  
13 UNITED STATES DISTRICT COURT  
14 EASTERN DISTRICT OF CALIFORNIA  
15

16 THE PRUDENTIAL LIFE  
17 INSURANCE COMPANY OF  
18 AMERICA,

19 Plaintiff,

20 v.  
21 DELLA Y. BROOKS, T.J.L., a minor  
22 and TINA LANCASTER

23 Defendants.

24 ) Case No.: 13-cv-0817-JST (MEJ)  
25 )  
26 ) **[PROPOSED] ORDER GRANTING**  
27 ) **THE PRUDENTIAL INSURANCE**  
28 ) **COMPANY OF AMERICA'S**  
29 ) **REQUEST TO APPEAR**  
30 ) **TELEPHONICALLY AT**  
31 ) **THE OCTOBER 16, 2013**  
32 ) **SETTLEMENT CONFERENCE**  
33 )  
34 ) Hearing: October 16, 2013  
35 ) Time: 10:00 AM  
36 ) Location: Judge's Chambers, 15th Flr,  
37 ) Phillip Burton Federal Building

38  
39 **GOOD CAUSE HAVING BEEN SHOWN**, Plaintiff The Prudential  
40 Insurance Company of America's Request to Appear Telephonically at the  
41 Settlement Conference scheduled for Wednesday, October 16, 2013 at 10:00 a.m.  
42 in this action is hereby granted. Counsel for Plaintiff will be readily available for  
43 the hearing and can be reached at (619) 330-1730.

44  
45 **IT IS SO ORDERED.**

46 Dated: October 8, 2013

47  
48   
49 HON. MARIA-ELENA JAMES  
50 UNITED STATES DISTRICT COURT JUDGE

1 Stacy L. Fode, Esq. (SBN 199883)  
2 fode@brownlawgroup.com  
3 Tara M. Jacobson, Esq. (SBN 265622)  
Jacobson@brownlawgroup.com  
3 BROWN LAW GROUP  
600 B Street, Suite 1650  
4 San Diego, CA 92101  
(619) 330-1700 Telephone  
5 (619) 330-1701 Facsimile

6 *Attorneys for Plaintiff, THE PRUDENTIAL INSURANCE COMPANY OF*  
AMERICA

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10  
11 THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA,

12 Plaintiff,

13 v.

14 DELLA Y. BROOKS, T.J.L., a minor  
15 and TINA LANCASTER

16 Defendants.

17 } Case No.: 3:13-CV-00817-JST

18 } **CERTIFICATE OF SERVICE**

19 I, Zola F. Carpizo, declare as follows:

20 I am an employee of a member of the bar of this Court at whose direction was  
made in the County of San Diego, State of California. I am over the age of 18 and  
21 not a party to the within action; my business address is 600 B Street, Suite 1650, San  
22 Diego, California 92101.

23 On October 7, 2013, I served the following document(s) described as:

24 1. **REQUEST TO APPEAR TELEPHONICALLY AT**  
25 **10/16/2013 SETTLEMENT CONFERENCE**  
26 2. **[PROPOSED] ORDER**  
27 3. **CERTIFICATE OF SERVICE**

28 on interested parties in this action by placing  the original  true copy(ies)

1 thereof as follows:

2 John L. Fitzgerald, Esq.  
3 Three Embarcadero Center, 8<sup>th</sup> Floor  
4 San Francisco, CA 94104  
5 415-394-9500  
john@jlfitzgeraldlaw.com

Tina Lancaster  
1149 Willow Avenue  
Pinole, CA 94564-1730

5 *Pro Se Defendant/Cross-Defendant*

6 *Counsel for Defendant/Cross-Claimant*  
7 *Della Y. Brooks*

8 Ciaran A. O'Sullivan, Esq.  
9 The Law Office of Ciaran O'Sullivan  
10 One Post Street, Suite 800  
11 San Francisco, CA 94104  
12 415-391-3711  
13 415-513-0449 Fax

14 *Counsel for Defendant/Cross-Defendant*  
15 *T.J.L.*

16  **EMAIL / ECF** by electronically filing the foregoing with the Clerk of the  
17 District Court using its ECF System, which electronically notifies them via email as  
18 indicated above.

19  **MAIL** by causing a true copy thereof to be placed in a sealed envelope with  
20 postage thereon fully prepaid to be placed in the United States mail at San Diego,  
California addressed as indicated above. I am "readily familiar" with this firm's  
practice of collection and processing correspondence for mailing. It is deposited with  
the U.S. Postal Service on that same day in the ordinary course of business.

21  **(FEDERAL):** I declare that I am employed in the office of a member of the  
22 bar of this court at whose direction the service was made.

23   
24 Zola F. Carpizo, Declarant  
25